## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

| GARY ELLIS                  | )  |
|-----------------------------|--|
| Plaintiff                   | )  |
| v.                          | ) CIVIL ACTION NO. ) 1:16-CV-154-RLJ-SKL |
| CAVALRY SPV I, LLC, CAVALRY | ) 1.10-CV-134-KLJ-SKL                    |
| PORTFOLIO SERVICES, LLC and | )  |
| GARNER & CONNER, PLLC       | )  |
|                             | )  |
| Defendants                  | )  |

## MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Come now Cavalry SPV I, LLC, Cavalry Portfolio Services, LLC and Garner & Conner, PLLC, ("Defendants"), and hereby files this Motion for Extension of Time to Respond to Plaintiff's Complaint. In support of its Motion, Defendants state as follows:

- 1. Plaintiff filed his Complaint on June 2, 2016.
- 2. Defendants are in the process of settlement negotiations with the Plaintiff and are currently working on the final settlement documents
- Defendants request that they be given up to and including October 19,2016, to file their answer to the Complaint.
  - 4. The request for additional time is not intended for delay.
  - 5. Defendants have not been made aware of any objections to this extension.

WHEREFORE, PREMISES CONSIDERED, Defendants request that the Court enter an Order granting their Motion for Extension of Time to Respond to Complaint, allowing them up to and including October 19, 2016, to file their response to Plaintiff's Complaint.

Respectfully submitted this the 29<sup>th</sup> day of September, 2016.

/s/ Christopher W. Conner Christopher W. Conner (BPR 017724) Garner & Conner, PLLC 250 High Street, Maryville, TN 37804 P.O. Box 5059, Maryville, TN 37802 (865) 984-1268 cconner@garnerconner.com

Attorneys for Defendants Cavalry SPV I, LLC, Cavalry Portfolio Services, LLC and Garner & Conner, PLLC

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document by Notice of Electronic Filing, or if the party served, does not participate in Notice of Electronic Filing, by U.S. First Class Mail, hand delivery, fax or email on this the 29<sup>th</sup> day of September, 2016.

Gary R. Ellis 7461 Mullins Cove Road Whitwell, TN 37397

> /s/ Christopher W. Conner Christopher W. Conner (BPR 017724)